

Interpretation of Japan's Toy Standard ST2025 Regarding Assembly Instructions via Website Using QR Code

Clause 4.29 "Assembly" is a newly added clause to the **Japan's ST2025 toy safety standard** outlining requirements for toy assembly, including considerations for general assembly and specific rules for toys assembled by children or adults, as well as those intended for disassembly.

JTA's Interpretation

On 24 October 2025, the Japan Toy Association ([日本玩具協会](#)) published the **operational interpretation of this clause** specifically on the method of providing assembly instructions via a website using a QR code ([組立指示書の提供方法 \(QR コードを介した Web サイトでの提供\)](#)).

Case Study Raised in the Interpretation

Question

Regarding the assembly requirements (4.29), for simple plastic models, can assembly instructions be provided on a website via a QR code on the product packaging?

Answer

1. Toys that are dangerous if not assembled properly must be provided with assembly instructions at the time the consumer receives the toy. For this reason, accessing assembly instructions on a website via a QR code is generally *not* considered to meet this condition.
2. However, if assembly itself is the core value of play and use after assembly is not the primary purpose, assembly instructions may be provided on a website via a QR code on product packaging, etc.

This decision will be made on a case-by-case basis, taking into account whether the emphasis is on "assembly" or "use after assembly."

Specific Examples

1. "Toys intended for assembly by adults" (e.g., ride-on toys, merry-go-rounds, playground equipment, etc.): Assembling the toy according to the assembly instructions is essential to ensure safety during use, and the emphasis is on "use after assembly." In this case, assembly instructions must be included or provided in the form of a leaflet or other means with the product.
2. "Toys intended for assembly by children" (e.g., plastic models, building blocks, etc.): If assembly itself is the core value of play and "use after assembly" is not considered the primary purpose, assembly instructions may be provided on a website via a QR code.

Reference

<https://www.toys.or.jp/stunyou/20251024.pdf>

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